## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs. : CASE NO. 1:19-CR-00308-AT-RGV-3

QUANTAVIUS FOSTER,

Defendant.

## MOTION FOR CRIMINAL RECORD AND PENDING CHARGES OF ALL STATE'S WITNESSES

**COMES NOW,** the Defendant, and moves that the State provide the criminal records and pending charges of all State's witnesses and shows the Court the following:

1.

The criminal record and pending charges of the State's witnesses are an essential element in confrontation of witnesses, not only in impeachment, but it illustrates their interest, bias, credibility, and other reasons.

2.

The office of the United States Attorney, as part of their office, has a computer, where, by the push of a button they can obtain this information, which is exculpatory.

3.

The accused does not have access to this information.

**WHEREFORE**, the accused requests this Honorable Court to direct the State to provide this information at least five {5} days before trial.

This 29<sup>TH</sup> day of September, 2021.

/s/ Alexander Repasky
Alexander J. Repasky
Attorney for Defendant
Georgia Bar No. 601050

4880 Lower Roswell Road Suite 165 Marietta, Georgia 30068 (770) 912-4016 alexrepasky@aol.com